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Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

VALERIE SOTO; an individual,)
)
Plaintiff)
)
vs.)
)
INFINITY HOSPICE CARE, LLC;)
)
an Arizona limited liability company,)
NEVADA HOSPICE AND PALLIATIVE)
CARE, INC.; a Nevada corporation,)
INFINITY HOSPICE CARE OF LAS VEGAS,)
LLC, a Nevada limited liability company,)
INFINITY HOSPICE CARE OF RENO, LLC;)
a Nevada limited liability company,)
SWEET HOME BELMONT, LLC;)
a Nevada limited liability company,)
DOES I-X; ROE CORPORATIONS)
AND/OR ENTITIES I-X,)
)
Defendants.)
)

Case No. 2:22-cv-0632-BNW

**JOINT STIPULATION TO PERMIT PLAINTIFF ADDITIONAL TIME TO RESPOND
TO DEFENDANT SWEET HOME BELMONT, LLC'S MOTION TO DISMISS
(FIRST REQUEST)**

Pursuant to Federal Rule of Civil Procedure ("FRCP") 6 and the Court's Local Rule of Civil Practice 7-1, the parties (Plaintiff and Defendant Sweet Home Belmont, LLC) hereby

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stipulate, subject to the Court’s approval, to permit Plaintiff additional time, to and until September 9, 2022, to respond to Defendant’s motion to dismiss (ECF No. 17). Presently, Plaintiff’s response to the motion to dismiss is due on August 10, 2022. This is Plaintiff’s first request for an extension of time for the reasons cited herein.

In support of this Stipulation, the parties agree to the following:

1. Good cause exists to support this request for additional time. The parties have discussed the pending motion and counsel for Plaintiff has notified counsel for Defendant Sweet Home Belmont, LLC that during the past two weeks he has been busy preparing for a trial scheduled to commence in Jeffrey Lewis v. Trader Joe’s Company, Clark County District Court, Case No. A-18-785891-C (Dept. 8) on August 15, 2022. That trial, involving complex issues and significant medical damages, is expected to last 2-weeks and has required undersigned counsel for Plaintiff to expend significant time preparing for it. Accordingly, Plaintiff’s counsel has not had sufficient time to prepare a response to the motion to dismiss filed by Sweet Home Belmont in this case.

2. Counsel for the respective parties have communicated regarding this Stipulation and agree that an extension of time to and until September 9, 2022 is appropriate under the circumstances. The additional time will permit Plaintiff’s counsel to complete and file an appropriate response to the pending dispositive motion.

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The parties respectfully request the Court approve this Stipulation.

/s/ *Melanie L. Thomas*

/s/ *Paul S. Padda*

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Melanie L. Thomas, Esq.
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Attorney for Plaintiff

Attorney for Defendant Sweet Home Belmont, LLC

Dated: August 8, 2022

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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: August 9, 2022

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